



Re: FW: Marathon Alaska Cook Inlet NPDES DMRs 
Diane Davis to: Hanh Shaw

01/17/2012 08:24 AM

History: This message has been forwarded.

Hi Hanh,

I don't think any correspondence came from me. The reason they received DMRs was Compliance Monitoring was turned off at the permit level but not the outfall level. That has now been corrected and they can disregard the DMRs sent to them (unless they plan to staff the platforms before the end of 2012).

Thank you.

Diane

Hanh Shaw

Hi Regina, I have the same email you forwarded...

01/11/2012 09:20:38 AM

From: Hanh Shaw/R10/USEPA/US
To: "Kincaid, Regina G. (MRO)" <rgkincaid@marathonoil.com>
Cc: "Shaw.Hanh@epa.gov" <Shaw.Hanh@epa.gov>, "Tornai, Mark D. (MRO)" <mdtornai@marathonoil.com>, Alfred Vann/R10/USEPA/US@EPA, Cindi Godsey/R10/USEPA/US@EPA, Diane Davis/R10/USEPA/US@EPA
Date: 01/11/2012 09:20 AM
Subject: Re: FW: Marathon Alaska Cook Inlet NPDES DMRs

Hi Regina,

I have the same email you forwarded in my files, but do not have a copy of EPA's response. However, I do recall that we have provided you with our concurrence that since Spark and Spurr are not staffed, and the only discharge is uncontaminated deck drainage, submittal of DMRs are not required.

Diane - Perhaps the correspondence to this effect came from your shop?

Thanks,
Hanh

"Kincaid, Regina G. (MRO)"

Hahn, I am following up on the issue of...

01/10/2012 12:37:21 PM

From: "Kincaid, Regina G. (MRO)" <rgkincaid@marathonoil.com>
To: "Shaw.Hanh@epa.gov" <Shaw.Hanh@epa.gov>
Cc: "Tornai, Mark D. (MRO)" <mdtornai@marathonoil.com>
Date: 01/10/2012 12:37 PM
Subject: FW: Marathon Alaska Cook Inlet NPDES DMRs

Hahn,

I am following up on the issue of not having to submit a DMR for our two unmanned Cook Inlet Platforms the Spark and Spurr NPDES permit numbers (AKG-31-5010 and AKG-31-5014). I cannot find any official documentation from the EPA saying that we do not have to submit DMR's. We just received preprinted DMR forms for the two above listed permits.

In the e-mail string below you will see correspondence with you regarding this issue.

Thank you for your time.

Regina

-----Original Message-----

From: Craig, Theresa M. (MRO)
Sent: Monday, January 09, 2012 12:53 PM
To: Kincaid, Regina G. (MRO)
Subject: RE: Marathon Alaska Cook Inlet NPDES DMRs

I did not receive an email confirmation from EPA.

~Theresa
713.296.2531 office
907.398.9954 cell

-----Original Message-----

From: Kincaid, Regina G. (MRO)
Sent: Monday, January 09, 2012 3:51 PM
To: Craig, Theresa M. (MRO)
Subject: FW: Marathon Alaska Cook Inlet NPDES DMRs

Theresa,

Do you have e-mail confirmation from EPA declaring that we do not have to do DMR's?

Thanks,

Regina

-----Original Message-----

From: San Miguel, Amanda L. (MRO)
Sent: Monday, January 09, 2012 12:43 PM
To: Kincaid, Regina G. (MRO)
Subject: FW: Marathon Alaska Cook Inlet NPDES DMRs

-----Original Message-----

From: San Miguel, Amanda L.
Sent: Friday, December 10, 2010 12:12 PM
To: San Miguel, Amanda L.; 'Davis.Diane@epamail.epa.gov'
Cc: 'Shaw.Hanh@epa.gov'; Craig, Theresa M.
Subject: RE: Marathon Alaska Cook Inlet NPDES DMRs

Diane and Hanh,

We just received another set of pre-printed DMRs, so it appears that the DMRs did not get suspended for our platforms. Please confirm that DMRs are not required for our unmanned facilities (see e-mail chain below).

If you have any questions, please contact Theresa Craig at (907) 283-1339 or tcraig@marathonoil.com. She is my replacement as the contact for Marathon's coverage under the Cook Inlet NPDES permit.

Thanks,
Amanda

-----Original Message-----

From: San Miguel, Amanda L.
Sent: Friday, July 23, 2010 11:20 AM
To: 'Davis.Diane@epamail.epa.gov'
Cc: Shaw.Hanh@epa.gov
Subject: RE: Marathon Alaska Cook Inlet NPDES DMRs

Diane and Hanh,

I apologize for my late response to this. Yes, I am requesting that the suspension of DMR requirements continue for both Spark and Spurr Platforms (AKG-31-5010 and AKG-31-5014). Under the past permit we did not submit DMRs either, due to the fact that the platforms have been unmanned since 1992. It is my interpretation of the permit that DMRs would not be required. Please confirm that this is correct.

Thanks,
Amanda San Miguel
HES Professional
Marathon Alaska Production LLC
Direct: 907.565.3038
Cell: 907.529.0433
Fax: 907.565.3076
ALSanmiguel@marathonoil.com

-----Original Message-----

From: Davis.Diane@epamail.epa.gov [mailto:Davis.Diane@epamail.epa.gov]
Sent: Tuesday, July 06, 2010 12:57 PM
To: San Miguel, Amanda L.
Cc: Shaw.Hanh@epa.gov
Subject: Re: Marathon Alaska Cook Inlet NPDES DMRs

Hanh,

Should compliance monitoring for these platforms be turned off? And if so, what date should be used?

Amanda,

Are you requesting temporary suspension of DMR requirements for both platforms or just AKG315010?

Thank you.

Diane

From: "San Miguel, Amanda L." <alsanmiguel@marathonoil.com>

To: Diane Davis/R10/USEPA/US@EPA

Date: 06/29/2010 09:40 PM

Subject: Marathon Alaska Cook Inlet NPDES DMRs

Diane,

I spoke with you a few times regarding Marathon Alaska Production LLC's DMRs for the Cook Inlet General NPDES Permit. We currently have two inactive platforms (Spark & Spurr) covered under the permit for uncontaminated deck drainage only. I was looking a little closer at General NPDES Permit AKG-31-5000 for Cook Inlet Oil & Gas facilities, and there is a paragraph on Page 15 that says the following:

The permittee is not required to conduct monitoring for the facility when it is not staffed. The permittee must provide EPA and ADEC written notification that the facility is no longer staffed 30 days prior to terminating monitoring requirements.

Also, attached is a PDF letter that was sent to EPA in 1996 for one of our platforms. Our platforms have not been active or manned for some time, and consequently, we have not submitted DMRs since the permit states that no monitoring would be required in our circumstances. I wanted to get EPA concurrence that this is still the case, and see if you would still need us to fill out the pre-printed DMRs that were mailed to us. Please feel free to give me a call back to discuss.

Thanks,

Amanda San Miguel
HES Professional
Marathon Alaska Production LLC
Direct: 907.565.3038
Cell: 907.529.0433
Fax: 907.565.3076
ALSanmiguel@marathonoil.com

(See attached file: Marathon Cook Inlet NPDES Monitoring Letter.pdf)